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June 20, 2021

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York

June 22, 2021

United States v. Jade Plante,
18 Cr. 444 (NRB)

Dear Judge Buchwald:

We respectfully write to request that the Court modify the conditions of Mr. Plante's supervised release. This Court sentenced Mr. Plante to eight months of imprisonment and two years of supervised release on August 7, 2019.

Mr. Plante has completed his term imprisonment and over half of his supervised release without incident. One of the conditions imposed by the Court (as a standard condition of supervised release) is the requirement that Mr. Plante receive prior approval before leaving his district of supervision. Mr. Plante routinely travels out of his district for his job (which involves installing large cooling systems). Mr. Plante respectfully requests that the Court modify his conditions of supervised release to travel throughout the United States without prior approval from Probation. The Government and Mr. Plante's Probation Officer consent to this request.

Respectfully submitted,

_____/s_____
John T. Zach

Copy to:
AUSA Robert Sobelman (via ECF)